

The Court, for good cause shown, can extend the preparation/notification deadline. *See* Fed. R. Civ. P. 6(b)(1). The Commission submits that good cause exists here because the parties have not reached a final agreement on ESI criteria and thus require additional time to negotiate/confer. Defendant does not oppose this Motion, and this Motion will not prejudice any party or delay any proceedings.

For good cause shown, the Commission asks the Court to extend the deadline to December 7, 2021. Due to the substance and nature of this Motion, the Commission also asks to be relieved of the requirement of submitting a supporting memorandum as mandated by Local Rule 7(b)(4).

This, the 23rd day of November 2021.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that on November 23, 2021, a copy of the foregoing document was served by electronic mail on the following counsel of record:

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